

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

In re: VOLUSION, LLC¹ Debtors.	§ § § § §	CASE NO. 20-50082 (DRJ) Chapter 11
--	-----------------------	---

**AMENDED WITNESS AND EXHIBIT LIST OF BARDIA DEJBAN AND
BAHAR DEJBAN FOR HEARING SCHEDULED FOR MAY 12, 2021**

TO THE CLERK OF THE BANKRUPTCY COURT:

COMES NOW, Bardia Dejbán and Bahar Dejbán (“**Claimants**”), by and through their counsel of record, Gillespie Sanford LLP, and hereby file this, their *Amended Witness and Exhibit List* in connection with the hearing scheduled for May 12, 2021 at 12:00 PM (Central Time) and, for such, would respectfully show as follows.

WITNESSES

1. Bahar Dejbán
2. Bardia Dejbán
3. Any witness designated by any other party.

Claimants reserve the right to call and/or use testimony offered into evidence by any other party. Claimants also reserve the right to offer into evidence such additional testimony as may be appropriate for rebuttal and/or impeachment purposes. Finally, Claimants reserve the right to amend and/or supplement this Witness List to the extent necessary or appropriate.

¹ The Reorganized Debtor in this Chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number is: Volusion, LLC (9037). The Reorganized Debtor’s service address is: 1835A Kramer Lane, Suite 100, Austin, TX 78758.

EXHIBITS

EX. #	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTED	ADMITTED
1	Proof of Claim No. 16 filed by Bahar Dejban			
2	Proof of Claim No. 21 filed by Bahar Dejban (Dkt.			
3	Proof of Claim No. 22 filed by Bahar Dejban			
4	Proof of Claim No. 15 filed by Bardia Dejban			
5	Proof of Claim No. 20 filed by Bardia Dejban			
6	Proof of Claim No. 23 filed by Bardia Dejban			
7	Complaint filed in lawsuit captioned Bardia Dejban and Bahar Dejban vs. Jeremy Rosenthal, Curt Lindeman, Troy Pike, Tim Stallkamp Case No. 21SMCV00517 in the Superior Court in the State of California for the County of Los Angeles Filed on 3-19-2021 (see Dkt.183.4 filed on 4-14-2021)			
8	Amended Combined Plan of Reorganization and Disclosure Statement of Volusion, LLC Pursuant to Chapter 11 of the Bankruptcy Code Dkt.103 filed 11-3-2020			
9	Order Confirming the Debtor's Combined Plan of Reorganization and Disclosure Statement of Volusion, LLC Pursuant to Chapter 11 of the Bankruptcy Code Dkt.128 filed 11-20-2020			
10	Claimants' Motion for Leave to Amend Proof of Claim of Bahar Dejban and Proof of Claim of Bardia Dejban and Brief in Support Dkt.193 filed on 4-27-2021			

EX. #	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTED	ADMITTED
11	Amended Claim of Bardia Dejban Dkt.193.1 – Exh-A filed 04-27-21			
12	Amended Claim of Bahar Dejban Dkt.193.2 – Exh-B filed 04-27-2021			
13	Declaration of Hal K. Gillespie in Support of Claimants’ Motion for Leave to Amend Proof of Claim of Bardia Dejban and Proof of Claim of Bahar Dejban and Brief in Support Dkt.193.3 filed on 4-27-2021			
14	Claimants’ Response in Opposition to Objection by Reorganized Debtor to Proofs of Claim Nos. 15, 20 and 23 Filed by Bardia Dejban Dkt.194 filed on 4-30-2021			
15	Declaration of Bardia Dejban Dkt.194.1 Exh-A filed on 4-30-2021			
16	Declaration of Bahar Dejban Dkt.194.2 Exh-B filed on 4-30-2021			
17	Claimants’ Response in Opposition to Objection by Reorganized Debtor to Proofs of Claim Nos. 16, 21 and 22 Filed by Bahar Dejban Dkt.195 filed on 4-30-2021			
18	All pleadings and court documents of record in the instant bankruptcy matter.			
19	Any exhibit designated by any other party.			
20	Any rebuttal and/or impeachment documents as appropriate.			

Claimants reserve the right to use any documents offered into evidence by any other party.

Additionally, Claimants reserve the right to offer into evidence such additional documents as may be appropriate for rebuttal and/or impeachment purposes. Finally, Claimants reserve the right to amend and/or supplement this Exhibit List to the extent necessary or appropriate.

DATED: May 7, 2021

Respectfully submitted,

GILLESPIE SANFORD LLP

By: /s/ Hal K. Gillespie
Hal K. Gillespie
State Bar No. 07925500

Gillespie Sanford LLP
4803 Gaston Ave
Dallas, TX 75246
Phone: 214.800.5111
Fax: 214.838.0001
Email: hkg@gillespiesanford.com

ATTORNEY FOR:
BARDIA DEJBAN AND BAHAR DEJBAN

CERTIFICATE OF SERVICE

I hereby certify that Notice of this document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District on this 7th day of May, 2021.

/s/ Hal K. Gillespie
Hal K. Gillespie